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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALI TAGHDIR, individually,

Plaintiff,

vs.

CSAA GENERAL INSURANCE COMPANY,
a California corporation, SILVESTRE
GONZALEZ-TEPETZI, DOES I through X, and
ROE CORPORATIONS XI through XX,
inclusive

Defendants.

CASE NO.: 2:22-cv-00172-JCM-NJK

STIPULATION AND
ORDER TO REMAND TO STATE
COURT

COME NOW, Plaintiff, ALI TAGHDIR, an individual ("Plaintiff"), by and through his counsel of record, ALBRIGHT, STODDARD, WARNICK & ALBRIGHT, Defendant, CSAA GENERAL INSURANCE COMPANY, a California Corporation ("Defendant"), by and through its respective counsel of record, RANALLI, ZANIEL, FOWLER & MORAN, LLC, and SILVESTRE GONZALEZ-TEPETZI ("Defendant"), by and through his counsel of record, WOOD, SMITH, HENNING & BERMAN LLP, and hereby stipulate and agree, subject to this Court's approval, to remand the case to State Court.

1. Plaintiff filed the original complaint in the Eight Judicial District Court, Clark County Nevada (case no. A-21-846001-C) against Defendant, CSAA General Insurance Company, a California Corporation.

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2. On February 24, 2022, Defendant, CSAA General Insurance removed the case to this Court pursuant to 28 U.S. Code § 1332 because there was complete diversity between the parties and the amount in controversy exceed \$75,000.00

3. On July 6, 2022, Plaintiff filed an amended complaint, which named Silvestre Gonzalez-Tepetzi, a Nevada resident, as an additional Defendant.

4. Given that Defendant Gonzalez-Tepetzi is a Nevada resident, this Court no longer has subject matter jurisdiction as there is no longer complete diversity between the parties.

5. Pursuant to 28 U.S.C. § 1447(e), if a non-diverse party is added to the case after it is removed to federal court and destroys complete diversity of citizenship between the parties, the Court must remand the suit to state court.

WHEREFORE, the parties, by stipulation and agreement, jointly request that the Court enter an order remanding the case to the Eight Judicial District Court, Clark County Nevada (case no. A-21-846001-C) for further proceedings with each party bearing its own fees and costs.

DATED this 28th day of September, 2022.

**ALBRIGHT, STODDARD, WARNICK
& ALBRIGHT**

/s/ Jorge L. Alvarez, Esq.

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DATED this 28th day of September, 2022.

**RANALLI, ZANIEL, FOWLER &
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Ali Taghdir vs. CSAA General Insurance Company, et al.

2:22-cv-00172-JCM-NJK

Stipulation and [Proposed] Order to Remand to State Court

DATED this 27th day of September, 2022.

WOOD, SMITH, HENNING & BERMAN, LLP

/s/ Elizabeth K. Scheinman

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Attorneys for Defendant,

Silvestri Gonzalez-Tepetzi

ORDER

IT IS SO ORDERED September 30, 2022


UNITED STATES DISTRICT JUDGE

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